ATTACHMENT 11-3

HIGHLY CONFIDENTIAL- ATTORNEYS' EYES ONLY

1   A If you saw a complete reference of OSPF   12:33PM
2 configuration on a device, we could find it from there. 12:33PM
3   Q What would I look for to find it?   12:33PM
4   A You could search for keywords like "area" or   12:33PM
5 "authentication."   12:33PM
6   Q Okay. Who else was on the team who came up with 12:33PM
7 the command "ip ospf authentication"?   12:33PM
8   A So I'm trying to recollect who all were part of 12:34PM
9 the OSPF team. There were probably a small set of   12:34PM
10 people.   12:34PM
11   Are you looking for specific names?   12:34PM
12   Q Yes.   12:34PM
13   A One person I could think of is Derek Yeung.   12:34PM
14   Q Can you spell that, please.   12:34PM
15   A Actually, he calls himself Derek, but the --   12:34PM
16 okay. D-r-e-k [sic] and Yeung is Y-e-u-n-g.   12:34PM
17   Q Okay.   12:34PM
18   A He was -- he was one of the senior guys in the   12:34PM
19 team.   12:34PM
20   Who were other people around that time. There   12:34PM
21 was -- there was somebody called Padma, P-a-d-m-a. Her 12:34PM
22 last name was Esnault, E-s-n-a-u-l-t. And these two   12:34PM
23 names I can remember very clearly. There may be more   12:35PM
24 people who were part of the OSPF team at that time.   12:35PM
25   Q Is that the best recollection you have, as you   12:35PM

Page 94

1 sit here today, of who else was on the team that came up 12:35PM
2 with the command "ip ospf authentication"?   12:35PM
3   A Yes.   12:35PM
4   Q Okay. Who else was on the team that came up with 12:35PM
5 the command "bfd all-interfaces"?   12:35PM
6   A That was on page 3?   12:35PM
7   Q Correct.   12:35PM
8   MR. NEUKOM: Page 3 of Exhibit 54.   12:35PM
9   THE WITNESS: This is actually much later than   12:36PM
10 that, so this -- I'm just going with the date, which is 12:36PM
11 also listed here, 2004 to 2005. We had different   12:36PM
12 engineers around that time on those PF [phonetic] team. 12:36PM
13 Couple names I can recollect. One was Liem, L-i-e-m,   12:36PM
14 and Nguyen, N-g-y-u-e-n, I think. Last name may have   12:36PM
15 spelled incorrectly. Another engineer was Peter,   12:36PM
16 P-e-t-e-r, Psenak, P-s-e-n-a-k. There are probably more 12:36PM
17 names, but those are a couple of names.   12:37PM
18 BY MR. SILBERT: 12:37PM
19   Q Okay. Are you able to tell me any other names of 12:37PM
20 people who are on the team who named the command   12:37PM
21 "bfd all-interfaces"?   12:37PM
22   A Yeah, I don't recall any more specific names. I   12:37PM
23 mean, there are people around that time, but I want to   12:37PM
24 make sure that they were in Cisco at that time.   12:37PM
25   For example, there is one engineer called Acee,   12:37PM

Page 95

1 A-c-e-e, Lindem, L-i-n-d-e-m, but I'm not 100 percent   12:37PM
2 sure if he was still on that team or he left Cisco by   12:37PM
3 that time.   12:37PM
4   Q Okay. Can you remember any other names of people 12:37PM
5 who were on the team?   12:37PM
6   A Nothing is coming to my head.   12:37PM
7   Q Okay. Referring back to Exhibit 54, would you   12:38PM
8 please turn to page 12.   12:38PM
9   A Yeah, I'm there.   12:38PM
10   Q In the bottom third of the page, do you see the   12:38PM
11 command expression "ip ospf bfd"?   12:38PM
12   A Yes.   12:38PM
13   Q Okay. And then in the next column with the   12:38PM
14 heading "Author/Originator Information," it says "Cisco" 12:38PM
15 and your name; correct?   12:38PM
16   A Yes.   12:38PM
17   Q Did you come up with the expression "ip ospf   12:38PM
18 bfd"?   12:38PM
19   A Yeah, so BFD -- I was the lead implementer of it 12:38PM
20 and very likely I proposed the -- the command.   12:39PM
21   Q Okay. And you say very likely you proposed the   12:39PM
22 command.   12:39PM
23   Do you have any recollection of doing that?   12:39PM
24   A I don't remember anybody else worked on it, so   12:39PM
25 I -- I proposed the command. Yeah, I think I proposed   12:39PM

Page 96

1 the command. I don't think there was anybody else on   12:39PM
2 this project.   12:39PM
3   Q Okay. And I appreciate your reasons for saying   12:39PM
4 that, but my question is: Do you have any recollection 12:39PM
5 of proposing this command "ip ospf bfd"?   12:39PM
6   A Yes.   12:39PM
7   MR. NEUKOM: Objection; asked and answered.   12:39PM
8 BY MR. SILBERT: 12:39PM
9   Q What's your recollection?   12:39PM
10   A I remember the document which described this, and 12:39PM
11 I think I was -- I was the author of the document. It's 12:39PM
12 a small amount of work. And generally what happens is   12:39PM
13 if there is large project, you have a larger group of   12:39PM
14 people who work on the project. For smaller ones, you   12:40PM
15 are the sole implementer, so you pretty much do most of 12:40PM
16 the work, all the way from designing the command and the 12:40PM
17 implementation. This was another smaller features.   12:40PM
18   Q Okay. The term "ip" in the command "ip ospf bfd" 12:40PM
19 refers to the Internet protocol standard that's   12:40PM
20 specified by the IETF; correct?   12:40PM
21   A "ip" in this command refers to Internet Protocol 12:40PM
22 Version 4, which is documented in RFC 791, and there   12:40PM
23 might be further revisions of it, if not.   12:40PM
24   Q Okay. And the term "ospf" in the command   12:40PM
25 "ip ospf bfd" refers to the OSPF standard that's   12:40PM

Page 97

25 (Pages 94 - 97)

HIGHLY CONFIDENTIAL- ATTORNEYS' EYES ONLY

1 specified by the IETF; correct?   12:40PM

2 A Yes.   12:40PM

3   MR. NEUKOM: Objection; misstates prior   12:41PM

4 testimony, calls for opinion.   12:41PM

5   THE WITNESS: The OSPF acronym we have used is   12:41PM

6 for Open Shortest Path First protocol, which is also   12:41PM

7 described and captured in RFC.   12:41PM

8 BY MR. SILBERT: 12:41PM

9 Q Okay. And the -- the term "bfd" in the command   12:41PM

10 "ip ospf bfd" refers to the BFD standard that's   12:41PM

11 specified by the IETF; correct?   12:41PM

12 A BFD acronym stands for Bidirectional Forwarding   12:41PM

13 Detection, which is -- which is, yes, also captured in   12:41PM

14 IETF RFC.   12:41PM

15 Q And the BFD standard itself describes using BFD   12:41PM

16 with OSPF; is that correct?   12:41PM

17   MR. NEUKOM: Objection; document calls for its --   12:41PM

18 pardon me. Document speaks for itself, calls for   12:42PM

19 opinion testimony.   12:42PM

20   THE WITNESS: BFD spec -- again, my recollection   12:42PM

21 is BFD spec was written in a more generic sense. It may   12:42PM

22 or may not have explicitly called out how and which   12:42PM

23 protocols you can -- you can make use of it, but, again,   12:42PM

24 if you have some more text, I can look into it.   12:42PM

25 //   12:42PM

Page 98

1   (Exhibit 57 was marked for   12:42PM

2   identification by the Court Reporter.)   12:43PM

3 BY MR. SILBERT: 12:43PM

4 Q Mr. Roy, would you please look at Exhibit 57 and   12:43PM

5 tell me if you recognize it.   12:43PM

6 A Yes, I do.   12:43PM

7 Q What is it?   12:44PM

8 A This is an RFC which describes the base protocol   12:44PM

9 for bidirectional detection.   12:44PM

10 Q Would you look, please, at the page that ends   12:44PM

11 with the Bates No. 760.   12:44PM

12 A Yes, I'm there.   12:44PM

13 Q Do you see Section 3.1? Towards the bottom of   12:44PM

14 that section in that single paragraph, it says, "For   12:44PM

15 example, an OSPF... implementation may request a BFD   12:44PM

16 session to be established to a neighbor discovered using   12:44PM

17 the OSPF Hello protocol."   12:44PM

18   Do you see that?   12:44PM

19 A Yes, I see that.   12:44PM

20 Q And that sentence is describing using BFD with   12:44PM

21 OSPF; correct?   12:45PM

22   MR. NEUKOM: Objection; document speaks for   12:45PM

23 itself, and to the extent it doesn't, calls for opinion   12:45PM

24 testimony.   12:45PM

25   THE WITNESS: Yeah, it -- so this does reference   12:45PM

Page 99

1 the OSPF standard, a newer version than what you have   12:45PM

2 shown me, and it talks about if you are compliant to   12:45PM

3 that version, that implementation could use BFD   12:45PM

4 services.   12:45PM

5 BY MR. SILBERT: 12:45PM

6 Q Okay. What resources did you use when naming the   12:45PM

7 "ip ospf bfd" command?   12:46PM

8   MR. NEUKOM: Objection; vague.   12:46PM

9   THE WITNESS: By "resources" you are implying   12:46PM

10 what type of material documents, those kind of things?   12:46PM

11   MR. SILBERT: Correct.   12:46PM

12   THE WITNESS: I had looked at the specification,   12:46PM

13 of course. It -- I don't know if it was this version or   12:46PM

14 if it was an earlier version of -- of the BFD protocol   12:46PM

15 specification, and beyond that, it may have been some   12:46PM

16 conversation about who wants it, but I don't have any   12:46PM

17 specific recollection was there a formal Product   12:46PM

18 Requirement Document also written with it.   12:46PM

19 BY MR. SILBERT: 12:46PM

20 Q What do you mean when you say "some conversation   12:47PM

21 about who wants it"?   12:47PM

22 A Yes. As I was saying earlier, most of the things   12:47PM

23 we implement are of two categories, typically.   12:47PM

24   One is customer-driven, which is, you are talking   12:47PM

25 to certain customers. They are telling you they want   12:47PM

Page 100

1 this type of technology. Then you try to build that   12:47PM

2 technology.   12:47PM

3   Or they are innovation-driven, which is we want   12:47PM

4 to showcase some new things which we have built, and   12:47PM

5 they are more outwards.   12:47PM

6   In the latter, you will not have a customer   12:47PM

7 requirement document -- or Product Requirement Document   12:47PM

8 because there is -- nobody has requested at this point   12:47PM

9 versus, in the former case, you will have some level of   12:47PM

10 conversation, communication, or perhaps a more formal   12:47PM

11 document which describes what a customer really intends   12:47PM

12 to do.   12:47PM

13 Q In the case of customer-driven developments, do   12:47PM

14 customers ever suggest CLI commands?   12:48PM

15   MR. NEUKOM: Objection; vague, compound, phrased   12:48PM

16 in the subjunctive.   12:48PM

17   MR. SILBERT: Now you got me.   12:48PM

18   THE WITNESS: Is that -- is that in reference to   12:48PM

19 this command in particular, or is it --   12:48PM

20   MR. SILBERT: No. I was asking you more   12:48PM

21 generally.   12:48PM

22   THE WITNESS: Okay. You are asking for my   12:48PM

23 opinion?   12:48PM

24   MR. SILBERT: I'm asking for your personal   12:48PM

25 knowledge.   12:48PM

Page 101

26 (Pages 98 - 101)

HIGHLY CONFIDENTIAL- ATTORNEYS' EYES ONLY

1   A   So --   04:46PM
2   Q   Thank you.   04:46PM
3   A   -- so the enclosure title "Description" was   04:46PM
4   written by Friedman, and this describes what he has   04:46PM
5   suggested, so I'm basing on this document.   04:47PM
6   Q   Okay. Other than what you read in that document,   04:47PM
7   do you know anything else about the origination of the   04:47PM
8   command expression "ip ospf authentication"?   04:47PM
9   A   No.   04:47PM
10   MR. SILBERT: Okay. Then thank you. At this   04:47PM
11   point, again, subject to any redirect based on   04:47PM
12   questioning by your counsel, I thank you very much for   04:47PM
13   your time and attention, and I'm concluding the   04:47PM
14   deposition.   04:47PM
15   THE WITNESS: Sure. Thanks.   04:47PM
16   MR. NEUKOM: No direct.   04:47PM
17   THE VIDEOGRAPHER: Okay.   04:47PM
18   MR. NEUKOM: At this time.   04:47PM
19   THE VIDEOGRAPHER: This concludes today's   04:47PM
20   deposition of Abhay Roy. The number of media used was   04:47PM
21   three and will be retained by Veritext Legal Solutions.   04:47PM
22   The time is 4:47 p.m. We are off the record.   04:47PM
23   (TIME NOTED: 4:47 P.M.)
24
25
                                            Page 230

1   I, ABHAY ROY, do hereby declare under penalty
2   of perjury that I have read the foregoing transcript;
3   that I have made any corrections as appear noted, in
4   ink, initialed by me, or attached hereto; that my
5   testimony as contained herein, as corrected, is true and
6   correct.
7   EXECUTED this _____ day of _____,
8   2015, at _____, _____.
9   (City)   (State)
10
11
12
13
14
15
16   _____
17   ABHAY ROY
18   VOLUME 1
19
20
21
22
23
24
25
                                            Page 231

1
2
3   I, the undersigned, a Certified Shorthand
4   Reporter of the State of California, do hereby certify:
5   That the foregoing proceedings were taken before
6   me at the time and place herein set forth; that any
7   witnesses in the foregoing proceedings, prior to
8   testifying, were placed under oath; that a verbatim
9   record of the proceedings was made by me using machine
10   shorthand which was thereafter transcribed under my
11   direction; further, that the foregoing is an accurate
12   transcription thereof.
13   I further certify that I am neither financially
14   interested in the action nor a relative or employee of
15   any attorney or any of the parties.
16   IN WITNESS WHEREOF, I have this date subscribed
17   my name.
18
19   Dated: December 30, 2015
20
21
22
23   <%signature%>
24   RACHEL FERRIER
25   CSR No. 6948
                                            Page 232

59 (Pages 230 - 232)

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

1   UNITED STATES DISTRICT COURT

2   NORTHERN DISTRICT OF CALIFORNIA

3   SAN JOSE DIVISION

4

- - - - - - - - - - - - - - - - - - x   Case No.

5   :   5:14-cv-05344-BLF (PSG)

                                    :

6   CISCO SYSTEMS, INC.,   :

                                    :

7   Plaintiff,   :

                                    :

8   vs.   :

                                    :

9   ARISTA NETWORKS, INC.,   :

                                    :

10   Defendant.   :

                                    :

11   - - - - - - - - - - - - - - - - - - x

12

13   VIDEOTAPED DEPOSITION OF GREG SATZ

14   March 23, 2016

15   HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

16   VOLUME 1

17

18

19

20

21   Reported by

22   Brooke R. Bohr

23   CSR No. 753

24   Job No 2272380

25   Pages 1 - 168

Page 1

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

1   VIDEOTAPED DEPOSITION OF GREG SATZ,
2 taken at the instance of the Defendant, at the
3 offices of TUCKER & ASSOCIATES, 605 W. Fort
4 Street, in the City of Boise, State of Idaho,
5 commencing at 10:10 a.m., on March 23, 2016,
6 before Brooke R. Bohr, CSR, RPR, a Notary Public
7 in and for the State of Idaho, pursuant to notice,
8 and in accordance with the applicable Rules of
9 Civil Procedure.
10
11   A P P E A R A N C E S
12 FOR PLAINTIFF
      John M. Neukom, Esq.
13   QUINN EMAMUEL URQUHART & SULLIVAN LLP
      50 California Street, 22nd Floor
14   San Francisco, CA 94111
      (415) 875-6320
15   johnneukom@quinnemanuel.com
16 FOR DEFENDANT
      Brian L. Ferrall, Esq.
17   KEKER & VAN NEST LLP
      633 Battery Street
18   San Francisco, CA 94111
      (415) 391-5400
19   bferrall@kvn.com
20
21
22
23
24
25

Page 2

1   W I T N E S S
2 GREG SATZ   Page:
3   Examination by Mr. Ferrall   5
4   Examination by Mr. Neukom   151
5   Further Examination by Mr. Ferrall 158
6
          * * * * *
7
8   E X H I B I T S
9
              Page:
10
11 Exhibit 400   Greg Satz LinkedIn   13
12 Exhibit 401   "TOPS-20 DECnet-20 Programmers   22
              Guide and Operations Manual"
13
     Exhibit 402   One-page Document with   36
14   Bates No. KL-883
15 Exhibit 403   Document Beginning Bates No.   69
              ARISTANDCA00022465
16
     Exhibit 404   Document Beginning Bates No.   84
17   CSI-CLI-00359132
18 Exhibit 405   One-page Document Bates No.   106
              CSI-CLI-00746924
19
     Exhibit 406   Document Bates No. CSI-CLI-01828732 112
20   Through Bates No. CSI-CLI-01828783
21 Exhibit 407   Document Beginning Bates No.   141
              CSI-CLI-01295215
22
23 Exhibit 408   Document Beginning Bates No.   143
              CSI-CLI-01295181
24
25   * * * * *

Page 3

1   BOISE, IDAHO
2   March 23, 2016, 10:10 a.m.
3
4   THE VIDEOGRAPHER: We are now on the record.
5   Please note that the microphones are
6 sensitive and may pick up whispering and private
7 conversations. Please turn off all cell phones or
8 place them away from the microphones as they can
9 interfere with the deposition audio. Recording
10 will continue until all parties agree to go off
11 record.
12   My name is David Cromwell, representing
13 Veritext. The date today is March 23, 2016, and
14 the time is approximately 10:10 a.m. This
15 deposition is being held at Tucker & Associates
16 located at 605 West Fort Street, Boise, Idaho
17 83702, and is being taken by counsel for the
18 defendant.
19   The caption of this case is Cisco
20 Systems, Inc. v. Arista Networks, Inc. This case
21 is filed in the United States District Court,
22 Northern District of California, San Jose
23 Division, Case No. 5:14-CV-05344-BLF PSG. The
24 name of the witness is Greg Satz.
25   At this time, the attorneys present in

Page 4

1 the room will identify themselves and the parties
2 they represent.
3   MR. FERRALL: Brian Ferrall of Keker &
4 Van Nest on behalf of Arista Networks.
5   MR. NEUKOM: John Neukom for the plaintiff.
6   THE COURT: Our court reporter, Brooke Bohr,
7 representing Veritext, will swear in the witness,
8 and we can proceed.
9
10   GREG SATZ,
11 produced as a witness at the instance of the
12 Defendant, having been first duly sworn, was
13 examined and testified as follows:
14
15   EXAMINATION
16 BY MR. FERRALL:
17   Q. Good morning, Mr. Satz. Can you please
18 state your full name.
19   A. Greg Leonard Satz.
20   Q. Mr. Satz, you are not represented by
21 counsel today; is that right?
22   A. Correct.
23   Q. Have you ever been deposed before?
24   A. I have.
25   Q. All right. So you know the basic

Page 5

2 (Pages 2 - 5)

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

1   There was a proper format and an improper format
2   based on the syntax.
3   But it's -- we're really in the weeds
4   now.
5   Q.   BY MR. Ferrall: Well, are you familiar
6   with -- we talked about show commands, right?
7   A.   Um-hum.
8   Q.   Are you familiar with either TOPS-20 or
9   other operating systems having show commands with
10 different level -- multiple levels of hierarchy to
11 them?
12   A.   Sure.
13   MR. NEUKOM: Objection; compound.
14   Q.   BY MR. FERRALL: Can you give me any
15 examples of --
16   A.   No.
17   Q.   Okay. Well, let me ask you to look
18 at --
19   A.   I think the -- you can actually
20 download a version of TOPS-20 and run it on your
21 phone.
22   Q.   On my phone? Wow. Probably --
23   A.   Which I would encourage you to do.
24   Q.   Were you familiar with something called
25 the "NCP" or --

Page 42

1   A.   Oh, the DECnet configuration?
2   Q.   -- the Network Control Program?
3   A.   Vaguely. I mean, I -- at one point, I
4   used it. I don't remember it.
5   Q.   Okay. All right.
6   A.   We could look in the manual if you want
7   to talk about it.
8   Q.   Well, if you could look at Exhibit 401.
9   A.   I mean, it's -- this is some old stuff.
10   Q.   On -- the section on NCP begins
11 around -- I guess it's Chapter 6.
12   A.   Okay.
13   Q.   6-2. But my question will go to
14 Table 6-1, which is on Page 6-12.
15   A.   Um-hum.
16   Q.   So let me just ask you if you -- are
17 you looking at that table on 6-12?
18   A.   I am.
19   Q.   Okay. And if we just focus on the show
20 commands there, do you see those?
21   A.   I do.
22   Q.   And are those ones that are familiar or
23 at least dust off your memory?
24   A.   No. I can say I do not -- I am sure I
25 have used show status quite a bit because that's

Page 43

1   such a generic function.
2   Q.   Um-hum.
3   A.   But I don't have a clear, I'm typing at
4   a screen at a prompt and these are coming out.
5   Q.   Okay. And do you understand, under
6   show status, if you go one column over --
7   A.   Um-hum.
8   Q.   -- there are some other words there,
9   NCP request, known, line, local?
10   A.   Um-hum.
11   Q.   Do you understand how those work?
12   A.   Sure.
13   Q.   How would those work with a show status
14 command, for example?
15   A.   You mean from a parsing point of view
16 or from how -- what they actually do inside the
17 code as a function? Because, again, it is those
18 levels.
19   Q.   Yeah. I mean as in terms of --
20   A.   You know, what NCP request actually
21 does in the code as a function and the information
22 it returns is different than the detail of
23 actually grabbing the keyword NCP request.
24   Q.   Okay. I guess my first question, then,
25 about this is how -- how would the parser handle

Page 44

1   these different keywords following show status?
2   MR. NEUKOM: Objection; foundation, phrased
3   in a hypothetical, and calls for opinion
4   testimony.
5   THE WITNESS: No different than if it
6   parsed A, B or C in an order. It is just a token.
7   Just a series of descriptions that permit what is
8   acceptable in a particular field.
9   So in this particular case, it is
10 looking for the letters S-H-O-W, followed by some
11 sort of space or command termination or break,
12 looking for another keyword the same way. Looking
13 for a third keyword. When it completes, it gets
14 down to what might be called a terminal condition
15 because it says, okay, I've completed this parse,
16 the parse is successful, now go perform something,
17 which would -- the interesting part, which is pull
18 out the NCP request data from the operating system
19 or networking kernel and then display it somehow.
20   Q.   BY MR. Ferrall: And were you ever
21 aware of operating systems growing their command
22 list in a way where they would -- they would add,
23 for example, further options under the show
24 command over time in subsequent versions?
25   A.   Oh, yes.

Page 45

12 (Pages 42 - 45)

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

1   MR. NEUKOM: Objection; vague and compound.
2   THE WITNESS: They would augment the command
3 set, the features, and there was, typically, a
4 user interface component to it, like modifying the
5 menu commands on your laptops today.
6   Q. BY MR. FERRALL: And was there -- would
7 they, typically, build upon existing keywords?
8   MR. NEUKOM: Same objections, and calls for
9 speculation.
10   THE WITNESS: Depending on the feature set.
11 If it was an extension of an existing feature set
12 or if it was brand new. I mean, as you described
13 a tree, those trees can be rearranged and
14 augmented or removed.
15   MR. FERRALL: Okay. Why don't we take our
16 first break. We've been going for about an hour.
17   THE WITNESS: Okay.
18   THE VIDEOGRAPHER: The time is 11:12 a.m.
19 Off the record.
20   (Recess taken.)
21   THE VIDEOGRAPHER: The time is 11:23 a.m.
22 On the record.
23   Q. BY MR. FERRALL: Mr. Satz, are you
24 familiar with any use of a "clear" command from
25 either TOPS-20 or early operating systems?

Page 46

1   A. I can't say I recall that.
2   Q. Okay.
3   A. There could have been, but there's a
4 check through the documentation better than my
5 memory.
6   Q. Okay. How about a "set" command?
7   A. I'm pretty sure VMS had set, as well as
8 TOPS-20.
9   Q. Now, you're aware that Cisco later used
10 show commands, right?
11   A. (Witness nods head.)
12   Q. What was the purpose of the Cisco show
13 commands, in general? I know there were many.
14   MR. NEUKOM: Objection; vague and compound.
15   THE WITNESS: To take data from inside the
16 software and present it to a user.
17   Q. BY MR. FERRALL: Were you aware of a
18 feature of TOPS-20 called "exec," E-X-E-C?
19   A. Um-hum. Yes.
20   Q. What was that?
21   A. The exec was the piece of software in
22 the operating system who interacted with the user
23 and contained the parser.
24   Q. We talked earlier about a privilege
25 mode in TOPS-20.

Page 47

1   A. Um-hum.
2   Q. And a normal mode, I think. What were
3 the other modes of TOPS-20 that you could recall?
4   A. They weren't necessarily modes, as --
5 you might think of them as different parse trees,
6 to use your tree analogy. They were command sets
7 that would be made available or not available
8 depending on, in the case of privilege mode,
9 having a password. So you had to know the secret
10 code to then enable the parse tree that was called
11 privilege mode.
12   Q. Was there a different prompt
13 indicator --
14   A. There is.
15   Q. -- for the different command sets that
16 were available, if you will?
17   A. Yes. And TOPS-20 -- and I think VMS
18 used the same mode -- had a subcommand mode. So
19 you could -- I don't know if you would put a comma
20 at the end of the line or if it was just a -- it
21 knew you were going into the mode. I can't -- I
22 don't remember anymore. But it would then
23 double-prompt you. So if your prompt was, like, a
24 dollar sign, it would give you two dollar signs to
25 know you were in the subcommand mode. Or in the

Page 48

1 privilege mode it would change the prompt from a
2 single dollar sign to, like, an "at" sign or a
3 "pound" sign. It would give you indication. And
4 usually there were ways to configure that so you
5 could tell it what you wanted it to do.
6   Q. And I think you said that you would
7 need a password, for example, to enter the
8 privilege mode?
9   A. In the ether TIP or the router software
10 that Cisco used. In TOPS-20 it was whether you
11 had a capability, you had an account that was
12 privileged.
13   Q. Was there a command or a -- something
14 you would enter in order to switch modes in
15 TOPS-20?
16   A. That was "enable."
17   Q. "Enable" was the command?
18   A. (Witness nods head.)
19   Q. Okay.
20   A. The magic word. All these commands are
21 are just a magic word that you agree will do a
22 function.
23   Q. Do you know, was there a configuration
24 mode in TOPS-20 to your knowledge?
25   A. TOPS-20 had the benefit of files. So,

Page 49

13 (Pages 46 - 49)

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

1 Exhibit 405 is a one-page document 2 marked CSI-CLI-00746924. 3 Exhibit 406 begins CSI-CLI-01828732, 4 and for this document I'll read the last number 5 because I think we're all unclear whether it is 6 one versus multiple documents. This ends with 7 Bates stamp CSI-CLI-01828783. 8 Exhibit 407 begins Bates stamp 9 CSI-CLI-01295215. 10 And Exhibit 408 begins 11 CSI-CLI-01295181. 12 MR. NEUKOM: Thanks all. 13 MR. FERRALL: Agreed. Thank you. 14 (The deposition concluded at 3:31 p.m.) 15 -oo0oo- 16 17 18 19 20 21 22 23 24 25 Page 166	1 R E P O R T E R ' S C E R T I F I C A T E 2 3 4 I, BROOKE R. BOHR, a Notary Public in 5 and for the State of Idaho, do hereby certify: 6 That prior to being examined, the 7 witness named in the foregoing deposition was by 8 me duly sworn to testify the truth, the whole 9 truth, and nothing but the truth; 10 That said deposition was taken down by 11 me in shorthand at the time and place therein 12 named and thereafter reduced into typewriting 13 under my direction, and that the foregoing 14 transcript contains a full, true, and verbatim 15 record of the said deposition. 16 I further certify that I have no 17 interest in the event of the action. 18 WITNESS my hand and seal March 30, 2016. 19 20 21 22 23 <%signature%> 24 Brooke R. Bohr 25 CSR No. 753 Page 168
1 V E R I F I C A T I O N 2 I declare under penalty of perjury 3 under the laws that the foregoing is 4 true and correct. 5 6 Executed on _____ , 20___ , 7 at _____ , _____ . 8 9 10 11 12 _____ 13 WITNESS SIGNATURE 14 15 16 17 18 19 20 21 22 23 24 25 Page 167	

<div align="right">43 (Pages 166 - 168)</div>